



Rocky Mountain
Remediation Services, L.L.C.
... protecting the environment

DIRECTIVE

AUTHORIZATION BASIS

OPS-DIR-002
Revision 0
Date Effective: 02/24/97

APPROVED: Frederick P. Hill
Sr. Vice President, Operations

Page 1 of 2

1. PURPOSE

The purpose of this directive is to outline Operation's policy regarding authorization basis. This directive closes Task No. 13 of the T-3/T-4 Action Plan.

2. SCOPE

The scope of this directive identifies the expectations with regard to developing and working within properly developed authorization basis documentation and systems. This includes environmental related compliance documents. It is applicable to all activities conducted within RMRS Operations.

3. DIRECTIVE

It is RMRS's policy to conduct all of its operations in full compliance with the appropriate Authorization Basis in the areas of environmental regulatory compliance, nuclear safety, criticality safety, and radiological controls. The Authorization Basis includes all of the documents that define the operational requirements for health, safety, emergency response, and environmental protection. Authorization Basis documents may include, among other items: permit requirements, sampling plans, QA plans, radiological controls, Health and Safety Plans, Safety Analysis Reports (SARs), Basis for Interim Operations (BIOs), Basis for Operation (BFOs), and criticality safety controls.

We will conduct our operations in a professional, vigilant manner, implementing the controls necessary to manage the identified hazards and potential accidents. We will implement the engineered and administrative controls identified in the appropriate Authorization Basis documents and Permits allowing us to perform the needed activities while protecting the Health and Safety of the public, workers, and the environment. Each person working on RMRS activities will be aware of the appropriate Authorization Basis documents and permits and associated controls. Self evaluations and the RMRS Qualify Assurance department audits will be used to verify compliance with the needed controls.

RMRS will evaluate all our projects during the planning phase to determine if any new Authorization Basis documentation, permits, or modifications to existing permits or documents, are required. Any identified Authorization Basis documents, permits, or modification development will be incorporated into the project tracking systems.

RMRS is fully committed to implementing an aggressive program to implement this policy. Existing Authorization Basis documents will be systematically reviewed on a regular basis to ensure that these documents are current and meet the requirements. Part of this program will be the implementation of a

documents are current and meet the requirements. Part of this program will be the implementation of a regulatory management system to ensure that RMRS is aware of the applicable regulations and changes to these regulations and incorporate the needed risk management controls.

It is the intent of RMRS to:

- (1) Develop and implement project and activity controls needed to address the requirements found in the Rocky Flats' Cleanup Agreement (RFCA). This will be done in accordance with the appropriate procedures. Where the Rocky Flats' Cleanup Agreement (RFCA) controls are not applicable company procedures or Conduct of Engineering PMG-302, Environmental Compliance Issues, will be used as guidance.
- (2) All applicable laws and regulations will be identified, evaluated, and applicable requirements addressed.
- (3) Follow Site Nuclear Safety Policy guidance and applicable Level 1 procedures as applicable, specific company procedures will be developed as required.
- (4) All nuclear safety documentation, will be planned and developed using the guidance found in DOE-EM-Std-5502-94. This standard provides guidance on the choice of applicable nuclear safety authorization basis documents; i.e., SARs, auditable safety analysis, and health and safety plans.
- (5) All environmental regulatory compliance documents will be selected and developed according to the appropriate Site Level 1 procedures or company procedures.